

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:
	Chapter 7
Nickesha Dickerson	:
a/k/a Chenell Dickerson	:
	Bankruptcy No. 21-10844-amc
Debtor	:

MOTION TO CONVERT CHAPTER 7 CASE TO CHAPTER 13 CASE

The Debtor, Nickesha Dickerson a/k/a Chenell Dickerson (hereinafter referred to as the “Debtor”), by and through her undersigned attorney hereby files this Motion to Convert Chapter 7 Case to Chapter 13 Case, and in support thereof states as follows:

1. The Debtor filed a voluntary petition under chapter 7 of title 11 of the United States Code (as amended, the “Bankruptcy Code”) on March 31, 2021 (the “Petition Date”) in the United States Bankruptcy Court for the Eastern District of Pennsylvania (the “Court”).
2. At the Debtor’s 341(a) Meeting of Creditors, the Debtor first recognized that a monthly contribution in the amount of \$775.00 from her ex-spouse to assist the Debtor with her mortgage payment constituted income.
3. Having identified the additional income, the Debtor has monthly income which the Debtor can pay in a chapter 13 plan.
4. At this time the Debtor moves this Court to convert her chapter 7 case to a case under chapter 13.
5. Pursuant to 11 U.S.C. § 706(a): “The debtor may convert a case under this chapter to a case under chapter 11, 12, or 13 of this title at any time, if the case has not been converted under section 1112, 1208, or 1307 of this title. **Any waiver of the right to convert a case under this subsection is unenforceable.**”

WHEREFORE, for the reasons set forth above, Debtor respectfully requests that the Court enter an Order substantially in the form of the Proposed Order granting the Motion to Convert the Debtor's Chapter 7 Case to a Chapter 13 Case and for such other relief as is just and proper.

Date: July 15, 2021

Respectfully submitted,

JENSEN BAGNATO, P.C.

/s/ Jeffrey M. Carbino

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